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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY:

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DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

PETER MICHAEL MARTIN (1),
SANDRA KOLE (2),

Defendants.

Criminal Case No. 07 CR 3406

I N D I C T M E N T

Title 8, U.S.C.,

Sec. 1324(a)(2)(B)(ii) -

Bringing in Illegal Aliens for

Financial Gain; Title 8, U.S.C.,

Sec. 1324(a)(2)(B)(iii) -

Bringing in Illegal Aliens Without

Presentation; Title 18, U.S.C.,

Sec. 2 - Aiding and Abetting

The grand jury charges:

Count 1

On or about November 18, 2007, within the Southern District of California, defendant SANDRA KOLE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Claudia Liliana Morales Diaz, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

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Count 2

On or about November 18, 2007, within the Southern District of California, defendant SANDRA KOLE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Claudia Liliana Morales Diaz, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

Count 3

On or about November 18, 2007, within the Southern District of California, defendant SANDRA KOLE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jose Olivares Garcia, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

Count 4

On or about November 18, 2007, within the Southern District of California, defendant SANDRA KOLE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jose Olivares Garcia, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an

1 appropriate immigration officer at a designated port of entry; in
2 violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

3 Count 5

4 On or about November 18, 2007, within the Southern District of
5 California, defendant SANDRA KOLE, with the intent to violate the
6 immigration laws of the United States, knowing and in reckless
7 disregard of the fact that an alien, namely, Juana Patricia Salto, had
8 not received prior official authorization to come to, enter and reside
9 in the United States, did bring to the United States said alien for
10 the purpose of commercial advantage and private financial gain; in
11 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

12 Count 6

13 On or about November 18, 2007, within the Southern District of
14 California, defendant SANDRA KOLE, with the intent to violate the
15 immigration laws of the United States, knowing and in reckless
16 disregard of the fact that an alien, namely, Juana Patricia Salto, had
17 not received prior official authorization to come to, enter and reside
18 in the United States, did bring to the United States said alien and
19 upon arrival did not bring and present said alien immediately to an
20 appropriate immigration officer at a designated port of entry; in
21 violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

22 Count 7

23 On or about December 9, 2007, within the Southern District of
24 California, defendants PETER MICHAEL MARTIN and SANDRA KOLE, with the
25 intent to violate the immigration laws of the United States, knowing
26 and in reckless disregard of the fact that an alien, namely, Sandra
27 Gutierrez-Garcia, had not received prior official authorization to
28 come to, enter and reside in the United States, did bring to the

1 United States said alien for the purpose of commercial advantage and
2 private financial gain; in violation of Title 8,
3 United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
4 United States Code, Section 2.

5 Count 8


6 On or about December 9, 2007, within the Southern District of
7 California, defendants PETER MICHAEL MARTIN and SANDRA KOLE, with the
8 intent to violate the immigration laws of the United States, knowing
9 and in reckless disregard of the fact that an alien, namely, Sandra
10 Gutierrez-Garcia, had not received prior official authorization to
11 come to, enter and reside in the United States, did bring to the
12 United States said alien and upon arrival did not bring and present
13 said alien immediately to an appropriate immigration officer at a
14 designated port of entry; in violation of Title 8,
15 United States Code, Section 1324(a)(2)(B)(iii), and Title 18,
16 United States Code, Section 2.

17 DATED: December 19, 2007.

18 A TRUE BILL

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21 
Foreperson

22 KAREN P. HEWITT
United States Attorney

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24 By: 
25 DAVID D. LESHNER
Assistant U.S. Attorney
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